

BRIAN J. STRETCH (CABN 163973)
Acting United States Attorney

DAVID R. CALLAWAY (CABN 121782)
Chief, Criminal Division

JEROME MAYER-CANTÚ (CABN 291623)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7301
Facsimile: (415) 436-7027
jerome.mayer-cantu@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 16-0002 WHA
)	
Plaintiff,)	[PROPOSED] ORDER CONTINUING
v.)	HEARING AND EXCLUDING TIME FROM
)	APRIL 19, 2016 TO APRIL 26, 2016
JAMES PERKINS et al.,)	
)	
Defendants.)	
)	
)	

Defendant TIMOTHY JEFFREY, represented by Dena Young, and the government, represented by Assistant United States Attorney Jerome Mayer-Cantú, hereby stipulate and agree as follows:

1. A status conference is currently scheduled for April 19, 2016.
2. Due to a family emergency, Assistant United States Attorney Jerome Mayer-Cantú will no longer be available on that date, and he has not found another attorney to take his place.
3. The parties therefore jointly request that the Court continue the April 19, 2016 hearing until April 26, 2016, at 2:00 PM.
4. The parties agree that in light of the availability of counsel and ongoing discovery, it remains appropriate to exclude time under the Speedy Trial Act for effective preparation and continuity

1 of counsel through and including the date of the newly requested hearing date of April 26, 2016. The
2 parties therefore jointly request that the Court enter the Proposed Order below continuing the hearing
3 date and excluding time.

4 **SO STIPULATED.**

6 Date: April 12, 2016

BRIAN J. STRETCH
Acting United States Attorney

8 /s/
JEROME MAYER-CANTÚ
Assistant United States Attorney

10 Date: April 12, 2016

11 /s/
DENA YOUNG
Attorney for Defendant Timothy Jeffrey


13 **[PROPOSED] ORDER**

14 Pursuant to stipulation, IT IS HEREBY ORDERED that the court proceeding currently
15 scheduled on April 19, 2016, be continued to April 26, 2016, at 2:30 PM.

16 Based upon the representation of counsel and for good cause shown, the Court finds that failing
17 to exclude the time between April 19, 2016, and April 26, 2016, would unreasonably deny the defendant
18 continuity of counsel and would deny counsel the reasonable time necessary for effective preparation,
19 taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further
20 finds that the ends of justice served by excluding the time between April 19, 2016, and April 26,
21 2016, from computation under the Speedy Trial Act outweigh the best interests of the public and the
22 defendant in a speedy trial.

23 Therefore, IT IS HEREBY ORDERED that the time between April 19, 2016, and April 26, 2016,
24 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

26 DATED: April 18, 2016.

27 
WILLIAM ALSUP
United States District Judge